

VIA ECF

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May 12, 2025

Hon. Margaret M. Garnett
United States District Judge
Southern District of New York
40 Foley Square, Room 2102
New York, NY 10007

Re: *UMG Recordings, Inc. et al. v. Believe S.A. et al.*, No. 1:24-cv-08406-MMG

Dear Judge Garnett:

On behalf of defendants Believe S.A. and TuneCore, Inc. (collectively, “Defendants”), and with the consent of all plaintiffs, we write to follow-up on our prior letter of March 4, 2025 requesting an adjournment of Defendants’ time to file their response to the Complaint as well as all related deadlines, in order to allow the parties to first engage in private mediation to try and amicably resolve this dispute. As an initial matter, thank you on behalf of all of the parties for accommodating that initial request.

The parties have scheduled an in-person mediation before Hon. Louis M. Meisinger (Ret.) for June 23 and June 24, 2025. This was the earliest date that the mediator, the parties and counsel were all available for an in-person mediation, but it falls after the current date by which Defendants are required to respond to the complaint.

The parties believe that the mediation is more likely to be successful if they can devote their full attention over the coming weeks toward a resolution. Accordingly, we respectfully request an extension of Defendants’ time to file their response to the Complaint and any counterclaims from June 4, 2025 to July 31, 2025, as well as a concomitant adjournment of the June 11, 2025 deadline to file the proposed case management plan and the June 18, 2025 Initial Pre-Trial Conference. All parties have consented to the requested extension.

The Court previously granted an extension of TuneCore’s time to respond to the Complaint in order to align its response deadline with that of foreign defendant Believe (ECF No. 19), and subsequently granted Defendants a 30-day extension (ECF No. 30) and then a 90-day extension “[i]n order to facilitate mediation of this matter” (ECF No. 32). Other than the items referenced in the first paragraph, there are no other scheduled dates that would be affected by this request.

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Respectfully submitted,

Jared R. Friedmann

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cc: All counsel of record (via ECF)

GRANTED. The parties shall submit a status letter within seven (7) days of the conclusion of the mediation. The time to answer or otherwise respond to the complaint is extended to **July 31, 2025**. The Initial Pre-Trial Conference previously scheduled for June 18, 2025 is adjourned to **Wednesday, August 13, 2025, at 9:30 a.m.** The parties shall file their joint letter and proposed case management plan by **August 6, 2025**.

SO ORDERED. Dated May 15, 2025.



HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE